



Inclusive Services Policy

Introduction

At Irwell Valley Homes we make it our mission to enable people to live well in their homes and communities by providing safe and good quality homes and services and making a difference in the communities we serve. By recognising everyone's differences and understanding the impact of inequalities, we can provide homes and services that are tailored to help everyone live well.

This policy explains how we identify when someone may need extra help, and how we adjust our services so they can access and use them fairly. Our aim is to provide services that work for people as individuals, not to treat everyone the same when their needs are different.

Scope

This policy applies to customers who live in homes we manage, including:

- General needs homes
- Affordable rent
- Shared ownership
- Supported housing
- Independent Living schemes

We also provide services to some customers who have different legal arrangements, such as leaseholders. While we aim to be accessible to everyone, the support we can offer in those cases may be limited by lease or management agreements.

Aims and Objectives

As a responsible social landlord, Irwell Valley Homes recognise the diverse needs of customers and is committed to taking appropriate steps to ensure that vulnerable customers, those with higher or more complex needs, or those who are facing exceptional circumstances are considered when delivering services.

Our Inclusive Services policy aims to ensure that these customers receive the services they need to sustain their tenancy and thrive in their home by identifying reasonable adjustments and applying these appropriately.

More specifically, the Inclusive Services policy sets out that we will:

- Understand what our customers need, not make assumptions
- Make reasonable changes to our services so customers are not disadvantaged
- Support customers to sustain their tenancy and feel safe in their home
- Communicate clearly and respectfully, in ways customers can understand
- Help customers access additional support, either from us or other organisations

Where we are not the best organisation to provide specialist support, we will work with customers to help them access the right help elsewhere.

Legal duties and regulatory requirements

Irwell Valley Homes has a duty under the Equality Act 2010 to advance equality of opportunity between people who share a protected characteristic and those who do not. This includes a legal obligation to consider and make reasonable adjustments where appropriate.

IVH understands that a failure to make reasonable adjustments could equal unlawful discrimination.

As a social landlord, we recognise that customers may experience vulnerability or require additional support for a wide range of reasons, not limited to protected characteristics. We therefore adopt a person-centred approach, working with customers to understand their individual circumstances and identify the most appropriate adjustments to support them.

This policy aligns with the Regulator of Social Housing's Transparency, Influence and Accountability Standard, which requires providers to treat all tenants with fairness and respect, understand the diverse needs of their tenants, and demonstrate how those needs are reflected in the design and delivery of services and communication.

The policy also aligns with the following Regulatory Standards:

- Safety and Quality Standard - e.g. providing reasonable adjustments in repairs and health and safety/compliance
- Tenancy Standard - e.g. provision of support to help sustain a customer's tenancy
- Neighbourhood & Community Standard – e.g. when providing customers support on ASB

In addition, this policy reflects the principles set out in the Housing Ombudsman's *Relationship of Equals* report. IVH is committed to:

- Promoting a values-led, customer-focused culture that empowers colleagues to respond to individual needs
- Taking a consistent and structured approach to identifying, recording and responding to vulnerability
- Communicating clearly, respectfully and in ways that meet individual customer needs
- Ensuring that complaint processes are accessible and adaptable, reflecting the differing needs of customers

Identifying additional needs and vulnerabilities

Individuals' ability to engage and manage their tenancy can vary over time. Having a particular condition or characteristic does not, in itself, mean that a person will require additional support.

IVH does not define whole groups of people as vulnerable by default (for example, disabled people or older people). Instead, we take a flexible, person-centred approach that considers each customer's individual needs, abilities and circumstances to identify where additional support or service adjustments may be required.

A customer's vulnerability or need for additional support may be identified through a range of sources, including:

- Self-disclosure by the customer or their advocate at any stage of their interaction with us
- Observations made by colleagues or contractors during contact, whether in person, by phone, or through other communication channels
- Referrals from statutory services, partner agencies or other organisations
- Information held within IVH systems, such as application data, tenancy audits or customer insight activity
- The use of data and technology to identify patterns or changes in behaviour which may indicate emerging support needs

We will routinely ask customers whether there is anything we should do differently to meet their needs, whether these are temporary or long-term. This ensures that less visible or changing needs are identified and that services can be tailored appropriately.

IVH will ensure that colleagues have the appropriate skills, training and system support to recognise, understand and respond to customer needs effectively. Colleagues are expected to remain alert to potential indicators of vulnerability and to act with professional curiosity, using information from routine interactions such as home visits or telephone contact.

Where appropriate, colleagues should sensitively encourage customers to share any support needs or vulnerabilities, ensuring conversations are handled respectfully and appropriately. Contractors and partners delivering services on behalf of IVH, including those working within customers' homes, are also expected to recognise potential indicators of vulnerability. They must report any concerns, including safeguarding risks, so that appropriate action can be taken.

Where a customer is identified as requiring additional support, IVH will:

- Record relevant information on the customer record, including vulnerabilities, communication or access needs, and agreed service adjustments
- Identify whether a representative or advocate is authorised to act on the customer's behalf
- Ensure that this information is accessible to relevant colleagues and shared appropriately with contractors, in line with data protection requirements

This approach ensures that colleagues have advance awareness of customer needs and can consistently apply appropriate adjustments when delivering services.

We will make this policy publicly available and ensure customers are aware of how to request support. Agreed reasonable adjustments will be recorded within our systems so they can be applied consistently across services.

All adjustments will be reviewed periodically to ensure they remain appropriate and effective, and updated where customer needs change.

When discussing and processing a request for a service adjustment colleagues must be alert to potential safeguarding risks, working in line with IVH's safeguarding policy and procedures, and escalating concerns when required.

Provision of services

We will make changes to how we provide services so that customers requiring additional support are not disadvantaged.

We will decide what adjustments are needed on a case-by-case basis by discussing the requirements with the customer and/or their representative and seeking to reach agreement on what may be reasonable in the circumstances.

We will not make assumptions about whether a service adjustment is needed or about what the adjustment should be.

Each service area will consider what additional support, consideration or variation in usual service provision is appropriate for customers. This may vary across service area, but the following are examples of possible adjustments:

- Accessible communications (large print, braille, translations and interpretations).
- Advocates – recording and recognising someone else as a dedicated contact person.
- Allowing longer for customers to answer the door when we call for an appointment.
- Offer face to face contact and a named point of contact.
- Agree with vulnerable customers how they wish us to contact them e.g. phone calls only.
- Avoiding specific times or days for visits where necessary.
- Prioritisation of services, such as emergency repairs.
- Provide accessibility support such as grab rails.
- Supporting victims of domestic abuse.
- Provision of additional support through our Tenancy Sustainment Service.
- Signposting to other service providers or partners.

Decision-Making and Governance for Service Adjustments

All requests for service adjustments will be considered in line with IVH's legal obligations under the Equality Act 2010 and relevant regulatory standards. Where a customer is disabled within the meaning of the Act, IVH has a legal duty to make reasonable adjustments where a provision, criterion, practice, or physical feature places the customer at a substantial disadvantage.

Decisions regarding service adjustments will be made in a structured and consistent manner, taking into account:

- The nature and extent of the disadvantage experienced
- The effectiveness of the proposed adjustment
- The practicality of implementation
- The proportionality of resources required

Decision Authority

Frontline colleagues may agree routine, low-risk adjustments. Service managers will approve complex or higher-risk cases where necessary.

Refusal of Adjustments

Where a request is declined, IVH will:

- Clearly explain the reasons
- Demonstrate compliance with legal and regulatory requirements
- Consider alternative adjustments
- Record the decision and rationale

Failure to make a reasonable adjustment where required may constitute unlawful discrimination. Decisions must therefore be evidence-based and proportionate.

Review and Escalation

Customers may request a review of decisions. Reviews will be undertaken by an independent manager where possible. Complex cases may be escalated for further review.

Consistency and Oversight

IVH will ensure consistency through staff training and guidance, quality assurance and audit, and monitoring trends and outcomes.

Complaints

Customers have the right to make a complaint. We will comply with the Housing Ombudsman Complaint Handling Code. We will monitor complaints for themes relating to accessibility and vulnerability and use learning to improve services.

We will make reasonable adjustments to help customers make complaints; this may include:

- Support submitting their complaint
- Alternative communication methods
- Flexibility with timescales where appropriate

Making a complaint will not affect the service a customer receives.

If a customer is unhappy about how we have handled an adjustment, they can ask for a review of the decision or make a complaint.

Responsibilities

All colleagues are expected to be alert to the possibility that a customer may be experiencing vulnerability, whether identified through information received or through direct interactions and observations. IVH will support colleagues to recognise and respond to these needs effectively by developing their awareness, skills, and confidence in identifying vulnerabilities and applying appropriate responses.

The Board holds overall responsibility for ensuring compliance with IVH policies and procedures. Responsibility for the implementation, awareness, and ongoing compliance with this Policy is delegated to the Chief Operations Officer.

Data Protection and Privacy

IVH will collect and use personal information to manage our customers' tenancies, provide housing and support services, keep people safe, and meet our legal duties as a social housing provider.

Customer information is handled securely, kept accurate and up to date, and only shared where the law allows or where it is necessary to deliver our services. We respect our customers' rights under UK GDPR, including the right to access to information, ask for corrections, and raised concerns about how data is used.

Monitoring and Compliance

The effectiveness of this policy will be reported to Board and other internal forums.

IVH will monitor effectiveness through defined KPIs, including:

- Percentage of customers with recorded request for inclusive services
- Quantity of service adjustments made and reasons made
- Customer satisfaction for customers with recorded request for inclusive service
- Complaint volumes and outcomes relating to inclusive services

Performance will be:

- Reported quarterly Leadership and annually to Board
- Reviewed through internal audit and compliance frameworks
- Used to inform service improvement plans

IVH will:

- Use customer feedback and complaints to improve services
- Benchmark against sector best practice
- Regularly review this policy

Equality Diversity and Inclusion

Irwell Valley Homes will ensure that through the delivery of this policy we will not directly or indirectly discriminate against any person or group of people because of their race, religion, gender, marital status, sexual orientation, disability or other grounds set out in our Equality, Diversity and Inclusion Policy.

All colleagues identifying additional needs or agreeing service adjustments must ensure that equality, diversity, health and mental health issues have been fully considered and reasonable adjustments made where appropriate

Cross Reference Documents and Good Practice

This policy should be read alongside other IVH policies and procedures including:

Alterations and Improvements Policy & Procedure
Complaints Policy
Customer Service Policy
Domestic Abuse Policy
Hoarding Policy and Procedure
Income Management Policy
Safeguarding Children and Adults at Risk Policy and Procedure
Domestic Abuse
Repairs Policy
Aids and Adaptation Policy